

Northern Plains Potato Growers Association

November 17, 2006

Standardization Section,
Fresh Products Branch, Fruit and Vegetable Programs
Agricultural Marketing Service
United States Department of Agriculture
1400 Independence Avenue, SW
Room 1661 South Building
Washington, D.C. 20250-0240

RE: Docket Number FV -06-303 Potatoes; Grade Standards

To Whom It May Concern:

These comments are being submitted on behalf of the Northern Plains Potato Growers Association. NPPGA is located in east Grand Forks, Minnesota and represents potato growers in northwest Minnesota and across the state of North Dakota. Several of our grower members participated directly in the efforts to modernize the potato grade and to harmonize those standards with Canadian regulations. The efforts of the Agricultural Marketing Service (AMS) were instrumental in providing the technical expertise to our industry that aided the development of a consensus for modifications to the potato grade standards.

By and large, the changes to the potato grade standards published in the September 22, 2006 Federal Register reflect the consensus developed by the industry. While our comments will indicate some areas needing refinement or clarification, we strongly support the vast majority of the changes as put forward in the proposed rule.

The following comments are on Section 51. 1564:

External Defects

We believe the term "appearance" is too subjective to be used in evaluating the tuber for bruising. We suggest that USDA remove the phrase "when materially detracting from appearance of the potato" and allow the bruise standard to rely solely on removals of flesh from the potato that in total for an individual potato result in the loss of more than 5 percent of the total weight of the potato or "when the area affected is more than 5 percent of the surface in aggregate (i.e. $\frac{3}{4}$ inch on a 2 $\frac{1}{2}$ inch or 6 oz. potato). Correspondingly lesser or greater areas in smaller or larger potatoes." We would also note that in other areas of the proposed rule where the definition or standard hinges on the losses resulting from the removal of portions of the potato, it be made clear that it is the total of the aggregate removals that are counted for each potato.

Elephant Hide

We support the addition of a category to allow for the consideration of this tuber condition. To make this category of external defect useful and consistent, USDA needs to develop and incorporate into the standard visual aids that allow effective comparison of the sample and the standard.

External Discoloration

We suggest that a specific color chip must be associated with this condition. Otherwise the evaluation of the tubers will be completely subjective and inconsistent results are likely. USDA should consider using Pot-L-1, Photo III as the standard for light tan and Pot-L-1, Photo 109 as the standard for light brown.

Grub Damage

We support the inclusion of the grade standard criteria. We would note that in Table III the criteria for "Damage" and "Serious Damage" utilize the same measurement criteria to determine two different damage levels. Both utilize the 3/4 inch on a 2 1/2 inch or 6 ounce potato. We recommend 1 inch on a 2 1/2 inch or 6 ounce potato as an indicator of serious damage.

Rodent and Bird Damage

Both the damage and the serious damage criteria are the same. We recommend 1 inch on a 2 1/2 inch or 6 ounce potato as the standard for serious damage.

Silver Scurf

We support the addition of this condition to the grade standards but suggest that the threshold be set at 55 percent rather than the 50 percent contained in the proposed rule.

Sprouts

We support leaving the standard for sprouts unchanged. It should remain a single standard to determine damage based on 10 percent of the potatoes having any sprout more than 3/4 inch. There needs to be no distinction for different tolerances at shipping and receiving. The existence of a 3/4 inch sprout constitutes a level of damage unacceptable to the industry at all levels.

The industry would like to obtain more information on the other color chips that were evaluated prior to making the determination that the POT-CC-22 chip was the appropriate chip for use in evaluating Internal Black Spot. Without the ability to view other chips that were considered, it is difficult to determine if the chip chosen is the most reliable indicator of significant tuber damage.

Finally, we would encourage USDA to review the proposed rule and eliminate all references to the "appearance" of the potato and strictly rely on more quantitative measures that can be evaluated more consistently. In most (Bruise, Enlarged Lenticels, Flea Beetle, Second Growth) but not all cases, (Dirt) a second objective standard is already incorporated into the proposed rule.

Thank you for considering our comments. We look forward to providing any additional information that will assist USDA in this process.

Sincerely,

Duane W. Maatz, President
Northern Plains Potato Growers Association